

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES
LLC, MONTGOMERY TECHNOLOGIES
LLC, VIRGIL QUANTITATIVE
RESEARCH, LLC, VIRGIL CAPITAL LLC,
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (LGS)

**[PROPOSED] ORDER GRANTING RECEIVER PERMISSION
TO FILE REPORTS TO THE COURT UNDER SEAL**

WHEREAS pursuant to the Order Appointing Receiver (“Receiver Order”), ECF No. 31, Robert A. Musiala Jr., Esq., Court-appointed Receiver in the above-referenced matter, files public Quarterly Status Reports within 30 days after the end of each calendar quarter;

WHEREAS the Receiver seeks to provide additional information to the Court regarding his efforts to faithfully execute his duties under the Receiver Order for the protection and benefit of harmed investors;

WHEREAS the Receiver Order directs the Receiver, among other duties, to “use reasonable efforts to determine the nature, location, and value of all property interests of the Receivership Entities and all other Recoverable Assets” and to “take such action as necessary and appropriate for the preservation of Receivership Property or to prevent the dissipation or concealment of Receivership Property”;

WHEREAS the Receiver seeks to protect the integrity of his investigation and prevent any potential wrongdoers from dissipating, concealing, or otherwise attempting to maintain assets that must be returned for the benefit of the Receivership Estates;

WHEREAS the additional information the Receiver seeks to provide the Court, if made public, would inhibit the Receiver from fulfilling his duty to prevent any potential wrongdoers from dissipating, concealing, or otherwise attempting to maintain assets that must be returned for the benefit of the Receivership Estates;

IT IS HEREBY ORDERED THAT:

The Receiver is authorized to file reports to the Court, apart from the Quarterly Status Reports under the Receiver Order, under seal to provide the Court with additional information regarding the Receiver's efforts to faithfully execute his duties under the Receiver Order for the protection and benefit of harmed investors.

Dated: December __, 2021
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE